

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

David Seabrook,

Plaintiff,

v.

City of North Charleston, Charleston County EMS, Sgt. Robert Kruger, Officer Scott Thomes, K-9 Officer D. Green, Officer William Taylor, John Doe, April Gadsden,

Defendants.

C/A No.: 2:20-cv-03093-RMG-MGB

**DEFENDANTS' DESIGNATION  
OF EXPERT WITNESS<sup>1</sup>**

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, Defendants City of North Charleston, Charleston County EMS, Sgt. Robert Kruger, Officer Scott Thomes, K-9 Officer D. Green, Officer William Taylor, and April Gadsden by and through their undersigned counsel, hereby disclose and designate the following as expert witnesses:

**Major Brian S. Batterton, Esquire**  
Cobb County Police Department  
4400 Lower Roswell Road  
Marietta, Georgia 30068  
Phone 678-230-3248  
Email [bsbatterton@comcast.net](mailto:bsbatterton@comcast.net)

Brian Batterton is a Major with the Cobb County Police Department and is also a licensed attorney. He has specialized expertise in the areas of law enforcement policies, practices, and procedures. His experience, background, and opinions in this matter are included in the attached expert report. (Exhibit 1).

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<sup>1</sup> Defendants received the report from Plaintiff's medical expert on September 13, 2021. Defendants would respectfully request additional time to name a medical expert due to the late disclosure of opinions.

Defendants also reserve the right to call any expert witness who may be required to substitute for an expert listed herein, in the event that the listed expert becomes unavailable to testify at trial due to circumstances beyond Defendants' control.

I, Christopher T. Dorsel, as attorney for Defendants, certify that Major Batterton's resume and fee schedule have been disclosed to Plaintiff's counsel.

Respectfully moved,

s/ Christopher T. Dorsel

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*Counsel for Defendants City of North Charleston,  
Charleston County EMS, Sgt. Robert Kruger, Officer  
Scott Thomas, K-9 Officer D. Green, Officer William  
Taylor, and April Gadsden*

September 13, 2021  
Charleston, South Carolina